

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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:
WOLFGANG HOHENSEE : **11-CV-2295-AKH-M D**
:
Petitioner, :
:
-against- :
:
KAYE SCHOLER LLP, :
:
Respondent. :
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UNOPPOSED MOTION TO CONTINUE

Petitioner Wolfgang Hohensee hereby moves to continue the briefing schedule and hearing date concerning Respondent's Motion dated April 25, 2011 ("Motion") in the above-captioned action. As grounds for this unopposed motion, Petitioner states as follows:

1. The current deadline for Petitioner to respond to the Motion is Thursday, June 2, 2011. Because of matters arising between Petitioner and his counsel giving rise to counsel's efforts to withdraw from the case (as reflected in Petitioner's counsel's May 26, 2011 letter to this Court), and in order to allow the Court time to consider counsel's request and Petitioner time to obtain successor counsel, Petitioner seeks to extend its time to respond to the Motion to Tuesday, July 5, 2011. Respondent does not oppose this request as a courtesy to counsel.¹

¹ Following a tentative agreement with Respondent concerning the schedule set forth above, Petitioner requested until September 30, 2011 to file his initial brief. Respondent does not agree to such an extension at this time, subject to its review and consideration of Petitioner's counsel's motion to withdraw.

2. The current deadline for Respondent to reply to Petitioner's response is Friday, June 17, 2011. Petitioner seeks to extend Respondent's time to reply to Monday, July 18, 2011. Respondent does not oppose this request.

3. On May 26, 2011, this Court scheduled a hearing for the Motion to take place on June 28, 2011, at noon. Petitioner seeks to extend the hearing date to Thursday, July 28, 2011, or such other date as the Court may set. Respondent does not oppose this request.

4. This is the second request for an extension of the briefing schedule, although this request arises from reasons different from those necessitating the last request. Specifically, as indicated above, this request is necessitated by the events giving rise to Petitioner's counsel's need to withdraw from continued representation of Petitioner.

Respectfully submitted,

WOLFGANG HOHENSEE

By: /s/_____

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Date: May 31, 2011